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17 *Attorneys for Defendant: Otto Trucking LLC*

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**
 20 **SAN FRANCISCO DIVISION**

21 Waymo LLC,

22 Plaintiff,

23 v.

24 Uber Technologies, Inc.; Ottomotto LLC; Otto
 Trucking LLC,

25 Defendants.

Case No. 3:17-cv-00939-WHA

DECLARATION OF DANIEL GRUVER

Courtroom: 8 - 19th Floor
 Judge: Hon. William Alsup

DECLARATION OF DANIEL GRUVER

I, Daniel Gruver, declare as follows:

1. I am an employee of Uber Technologies, Inc. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. From November 2011 to January 2016, I was an employee of Google, Inc. working as a technical program manager on the LiDAR team for Project Chauffeur.

3. Seval Oz was an employee of Google and a team member of Chauffeur. She was not a member of the LiDAR team and was more involved in the business side of Chauffeur.

4. I was responsible for attaching lasers to printed circuit boards for GBR2 devices.

5. These printed circuit boards were not stored in any locked or secured location, but were available in many places throughout the Chauffeur office. For example, I had many printed circuit boards on my desk, which was located in a common area where the desks of other employees—some on the LiDAR team and others who were not—were also located.

6. In or around 2012 or 2013, the Chauffeur team had some extra printed circuit boards of GBr2 devices.

7. I remember Ms. Oz suggesting these boards could make good earrings because of their gold metallization and the way light reflected off the laser dies.

8. I do not recall anyone expressing concern about Ms. Oz receiving or having possession of one or more of the printed circuit boards.

9. I also do not recall anyone expressing concerns about Chauffeur employees in general relocating or taking possession of the printed circuit boards.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of September, 2017, in San Francisco, California.

/5/

DANIEL GRUYER

PROOF OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is: Three Embarcadero Street, 28th Floor, San Francisco, California 94111.

On **September 13, 2017**, I electronically served the following document on the persons below as follows:

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☐ (MAIL). I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on **September 13, 2017**, at San Francisco, California.

Hayes P. Hyde
(Type or print name)

/s/ Hayes P. Hyde
(Signature)